

Page 1	Page 3
<p>1</p> <p>2 IN THE UNITED STATES DISTRICT COURT</p> <p>3 WESTERN DISTRICT OF WISCONSIN</p> <hr/> <p>4 STACY RANDALL,</p> <p>5 Plaintiff,</p> <p>6 v.</p> <p>7 REED C. WIDEN, MICHAEL KIESLER,</p> <p>8 WIDEN ENTERPRISES, LLC, and</p> <p>9 WINDY WATERS, INC.</p> <p>10 Defendants.</p> <hr/> <p>11</p> <p>12</p> <p>13</p> <p>14 DEPOSITION OF THE WITNESS,</p> <p>15 LOUISE PLASSE,</p> <p>16 TAKEN BY THE DEFENDANTS</p> <p>17</p> <p>18 DATE: Wednesday, January 10, 2024</p> <p>19 TIME: 10:01 a.m. - 10:52 a.m.</p> <p>20 PLACE: 777 Flagler Drive, Suite 1900</p> <p>21 West Palm Beach, Florida</p> <p>22 Stenographically reported</p> <p>23 by Gina R. Grant</p> <p>24</p> <p>25</p>	<p>1 I N D E X</p> <p>2</p> <p>3 WITNESS PAGE</p> <p>4 LOUISE PLASSE</p> <p>5 Direct by Mr. Laing 5</p> <p>6</p> <p>7 ***Confidential redacted portions</p> <p>8 under separate cover ***</p> <p>9 E X H I B I T S</p> <p>10 MARKED IDENTIFIED</p> <p>11 Defendants' Exhibit No. 1 4 7</p> <p>12 (Subpoena)</p> <p>13 Defendants' Exhibit No. 2 4 9</p> <p>14 (Verified Complaint of Foreclosure)</p> <p>15 Defendants' Exhibit No. 3 4 13</p> <p>16 (Altisource Real Estate Valuation)</p> <p>17 Defendants' Exhibit No. 4 4 14</p> <p>18 (Uniform Final Judgment of Foreclosure)</p> <p>19 Defendants' Exhibit No. 5 4 16</p> <p>20 (Residential Contract for Sale and Purchase)</p> <p>21 Defendant's Exhibit No. 6 4 17</p> <p>22 (Handwritten Hardship Letter)</p> <p>23 Defendants' Exhibit No. 7 4 20</p> <p>24 (Mortgage Assistance Application)</p> <p>25 Defendants' Exhibit No. 8 4 20</p> <p>(Mortgage Assistance Application)</p> <p>Defendants' Exhibit No. 9 4 27</p> <p>(Closing Statement)</p> <p>Defendants' Exhibit No. 10 4 29</p> <p>(Approval of Short Sale)</p> <p>Defendants' Exhibit No. 11 4 34</p> <p>(Stock Redemption Agreement)</p> <p>Defendants' Exhibit No. 12 4 37</p> <p>(Closing Agreement)</p> <p>Defendants' Exhibit No. 13 4 38</p> <p>(Appraisal Report)</p>
Page 2	Page 4
<p>1 APPEARANCES:</p> <p>2 ON BEHALF OF THE PLAINTIFF:</p> <p>3 REINHART BOERNER VAN DEUREN S.C.</p> <p>4 1000 North Water Street, Suite 1700</p> <p>5 Milwaukee, Wisconsin 53202</p> <p>6 By: SAMUEL SYLVAN, ESQUIRE</p> <p>7 (Via videoconference)</p> <p>8 ON BEHALF OF THE DEFENDANTS:</p> <p>9 O'NEIL, CANNON, HOLLMAN, DEJONG &amp; LAING, S.C.</p> <p>10 111 East Wisconsin Avenue, Suite 1400</p> <p>11 Milwaukee, Wisconsin 53202-4870</p> <p>12 By: DEAN P. LAING, ESQUIRE</p> <p>13 ON BEHALF OF PHH MORTGAGE CORPORATION:</p> <p>14 BURR &amp; FORMAN, LLP</p> <p>15 350 East Las Olas Boulevard, Suite 1440</p> <p>16 Fort Lauderdale, Florida 33301-4126</p> <p>17 By: SARA L. SOLANO, ESQUIRE</p> <p>18 Also present: Benny Dorlouis, Videographer</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 Deposition of LOUISE PLASSE, the WITNESS</p> <p>2 herein taken on behalf of the DEFENDANTS herein for the</p> <p>3 purpose of discovery and for use as evidence in the</p> <p>4 above-entitled cause, before GINA GRANT, Court Reporter</p> <p>5 and Notary Public in and for the State of Florida at</p> <p>6 Large, at 777 South Flagler Drive, Suite 1900, City of</p> <p>7 West Palm Beach, County of Palm Beach, State of Florida</p> <p>8 on Wednesday, January 10, 2024, commencing at 10:01</p> <p>9 o'clock, a.m.</p> <p>10 -----</p> <p>11 Whereupon:</p> <p>12 LOUISE PLASSE,</p> <p>13 a witness herein being of lawful age, and being first</p> <p>14 duly sworn in the above cause, testified on her oath as</p> <p>15 follows:</p> <p>16 (Defendant's Exhibit Numbers 1 through 13</p> <p>17 were marked for identification.)</p> <p>18 THE VIDEOGRAPHER: We're now on the video</p> <p>19 record. Today's date is January 10th, 2024,</p> <p>20 and the time is 10:01 a.m. This is the video</p> <p>21 deposition of Louise Plasse taken in the matter</p> <p>22 of Stacy L. Randall versus Widen, et al. This</p> <p>23 case is being held at 777 South Flagler Drive,</p> <p>24 Suite 1900, West Palm Beach, Florida. The</p> <p>25 videographer is Benny Dorlouis, and the court</p>

<p>Page 5</p> <p>1 reporter is Gina Grant.</p> <p>2 Will counsel please introduce themselves</p> <p>3 for the record?</p> <p>4 MR. LAING: Dean Laing present here at the</p> <p>5 deposition on behalf of the defendants.</p> <p>6 MR. SYLVAN: Samuel Sylvan present via</p> <p>7 Zoom on behalf of the plaintiff, Ms. Stacy</p> <p>8 Randall.</p> <p>9 MS. SOLANO: Sara Solano present in</p> <p>10 person. Counsel for PHH Mortgage Corporation.</p> <p>11 Whereupon:</p> <p>12 LOUISE PLASSE,</p> <p>13 a witness herein being of lawful age and being first</p> <p>14 duly sworn in the above cause, testified on her oath as</p> <p>15 follows:</p> <p>16 DIRECT EXAMINATION</p> <p>17 BY MR. LAING:</p> <p>18 Q Good morning.</p> <p>19 A Good morning.</p> <p>20 Q State your full name, please.</p> <p>21 A Louise Plasse.</p> <p>22 Q And how do you spell your last name?</p> <p>23 A P like in Peter, l-a-s-s-e.</p> <p>24 Q How are you employed?</p> <p>25 A I am employed with OCWEN Financial</p>	<p>Page 7</p> <p>1 Q In front of you, you've got a pile of</p> <p>2 documents, and the first document on the top of the</p> <p>3 pile is Exhibit 1, which is the subpoena to testify</p> <p>4 at a deposition in a civil action that was served on</p> <p>5 PHH Mortgage Corporation in this case, meaning the</p> <p>6 case of Randall v. Widen. Have you seen that</p> <p>7 document before?</p> <p>8 A I have, yes.</p> <p>9 Q Are you prepared to testify as the</p> <p>10 corporate designee of PHH Mortgage Corporation as to</p> <p>11 the topics listed on pages 4 and 5 of the subpoena?</p> <p>12 A I am to the best of my ability, yes.</p> <p>13 Q Do you understand that you are here today</p> <p>14 testifying on behalf of the corporation, meaning</p> <p>15 that you're going to testify as to the institutional</p> <p>16 knowledge of that corporation, and you're not here</p> <p>17 today to testify in your individual capacity?</p> <p>18 A Yes, I do.</p> <p>19 Q In other words, when I ask you questions</p> <p>20 today, I'm not asking you questions for you to</p> <p>21 answer individually. I'm asking for you to answer</p> <p>22 questions on behalf of PHH Mortgage Corporation. Do</p> <p>23 you understand that?</p> <p>24 A I do, yes.</p> <p>25 Q In response to the subpoena you have in</p>
<p>Page 6</p> <p>1 Corporation.</p> <p>2 Q And what's your position?</p> <p>3 A I am a senior loan analyst.</p> <p>4 Q What is the relationship, if any, between</p> <p>5 PHH Mortgage Corporation and OCWEN Financial --</p> <p>6 whatever you said the last name was.</p> <p>7 A OCWEN Financial Corporation. PHH is a</p> <p>8 subservicer under the OCWEN umbrella. We merged</p> <p>9 with PHH in 2019.</p> <p>10 Q I understand that you are here today to</p> <p>11 testify as the designated corporate representative</p> <p>12 of PHH Mortgage Corporation; is that correct?</p> <p>13 A Yes, I am.</p> <p>14 Q Could you describe just generally the</p> <p>15 nature of PHH Mortgage Corporation's business?</p> <p>16 A Generally, we are a mortgage servicer. In</p> <p>17 that capacity we service several million loans. I</p> <p>18 don't know the exact number, but we service mortgage</p> <p>19 loans. And in that capacity as a servicer, we have</p> <p>20 obligations with our investors to service and</p> <p>21 maintain the daily business and recordkeeping of the</p> <p>22 mortgages that we service.</p> <p>23 Q Is one of the companies that PHH Mortgage</p> <p>24 Corporation services U.S. Bank?</p> <p>25 A Yes.</p>	<p>Page 8</p> <p>1 front of you, Exhibit 1, as well as prior subpoenas</p> <p>2 issued in this case, PHH Mortgage Corporation has</p> <p>3 produced a large number of documents. Are you aware</p> <p>4 of that?</p> <p>5 A I am, yes.</p> <p>6 Q And were those documents all maintained in</p> <p>7 the corporate records of PHH Mortgage Corporation?</p> <p>8 A Yes, they are.</p> <p>9 Q I'm going to be asking you questions today</p> <p>10 about a loan that was taken out by Stacy Randall and</p> <p>11 her then husband, Steven Randall, in 2007 in</p> <p>12 connection with -- with a residential home located</p> <p>13 in Lithia, Florida. Are you familiar with that</p> <p>14 loan?</p> <p>15 A I am, yes.</p> <p>16 Q And specifically the address of that</p> <p>17 property is 6116 Avocetridge Drive in Lithia,</p> <p>18 Florida. Are you aware of that?</p> <p>19 A Yes, I am.</p> <p>20 Q And is Lithia, Florida, a suburb of Tampa,</p> <p>21 Florida?</p> <p>22 A Yes, it is.</p> <p>23 Q The loan taken out by Stacy Randall and</p> <p>24 her then husband, Steven Randall, initially in</p> <p>25 2007 was ultimately assigned by the originator to</p>

<p>Page 9</p> <p>1 U.S. Bank. Am I correct on that?</p> <p>2 A Yes.</p> <p>3 Q What were PHH Mortgage Corporation's</p> <p>4 responsibilities and obligations in connection with</p> <p>5 that loan?</p> <p>6 A As I stated earlier, our obligations are</p> <p>7 to service and maintain the loan, apply payments as</p> <p>8 they come in, answer any questions should the</p> <p>9 homeowner call in to inquire about any issues they</p> <p>10 may or may not be having, and in general just</p> <p>11 service the loan according to guidelines.</p> <p>12 Q And would that include issues relating to</p> <p>13 a customer being in default?</p> <p>14 A Yes.</p> <p>15 Q Look at Exhibit 2, please. Exhibit 2 is a</p> <p>16 document called "Verified Complaint for Foreclosure</p> <p>17 of Mortgage," which has a Bates stamp number on it</p> <p>18 of PHH Mortgage 000001. Do you have that in front</p> <p>19 of you?</p> <p>20 A I do, yes.</p> <p>21 Q Okay. And if you turn to Exhibit A of</p> <p>22 that document -- I think you're there.</p> <p>23 A Okay.</p> <p>24 Q Okay. Is that exhibit, meaning Exhibit A</p> <p>25 to Exhibit 2 in this case, the original loan note</p>	<p>Page 11</p> <p>1 were in default of the initial note?</p> <p>2 A Yes. That's -- that would indicate, yes.</p> <p>3 Q And, in fact, the amount outstanding went</p> <p>4 from \$500,750 initially to \$793,535.07 as of</p> <p>5 January 23, 2017, correct?</p> <p>6 A Correct.</p> <p>7 Q So let's go back to page 1 of this</p> <p>8 exhibit. This is a verified complaint for</p> <p>9 foreclosure of mortgage that was filed by U.S. Bank</p> <p>10 against Stacy Randall and Steven Randall among</p> <p>11 others, correct?</p> <p>12 A Correct.</p> <p>13 Q And it was filed on December 20, 2018,</p> <p>14 according to the header on page 1; is that correct?</p> <p>15 A Yes.</p> <p>16 Q And if you go to paragraph 9 of the</p> <p>17 complaint, it indicates that Stacy Randall and</p> <p>18 Steven Randall have defaulted under the amended note</p> <p>19 by failing to pay the payment due as of March 1 of</p> <p>20 2018 and all subsequent payments; is that correct?</p> <p>21 A Yes, that's correct.</p> <p>22 Q And then if you go to paragraph 11, it</p> <p>23 says that as of the date this document was filed</p> <p>24 with the court, meaning as of December 20, 2018,</p> <p>25 Stacy Randall and Steven Randall owed U.S. Bank</p>
<p>Page 10</p> <p>1 that relates to this property in Lithia, Florida?</p> <p>2 A It does contain that information, yes.</p> <p>3 Q And according to this loan note, the</p> <p>4 original loan amount for that property was \$500,750.</p> <p>5 Am I correct on that?</p> <p>6 A That is correct.</p> <p>7 Q Then please turn to Exhibit C of this</p> <p>8 document, which starts out on Bates labeled</p> <p>9 page 000042.</p> <p>10 A Okay.</p> <p>11 Q Do you have that in front of you?</p> <p>12 A I do.</p> <p>13 Q This document is called a "Loan</p> <p>14 Modification Agreement" that was signed by Stacy</p> <p>15 Randall and Steven Randall on January 23, 2017,</p> <p>16 correct?</p> <p>17 A Yes, that's correct.</p> <p>18 Q And if you go to page 2 of that document,</p> <p>19 it indicates in paragraph number 1 that as of</p> <p>20 March 1 of 2017, the amount payable under the</p> <p>21 original promissory note is \$793,535.07; is that</p> <p>22 correct?</p> <p>23 A It is.</p> <p>24 Q Does that suggest or indicate that between</p> <p>25 2007 and 2017 that Stacy Randall and Steven Randall</p>	<p>Page 12</p> <p>1 \$788,209.24 on the mortgage note; is that correct?</p> <p>2 A Yes.</p> <p>3 Q Then if you go to page 3 under the</p> <p>4 wherefore clause, it indicates that U.S. Bank was</p> <p>5 demanding that the court enter a judgment of</p> <p>6 foreclosure against the property, and if the</p> <p>7 proceeds of the sale of the property are</p> <p>8 insufficient to pay the Randall's claim -- or U.S.</p> <p>9 Bank's claim, the -- U.S. Bank was asking the court</p> <p>10 to enter a deficiency judgment against Stacy Randall</p> <p>11 and Steven Randall, correct?</p> <p>12 A Yes.</p> <p>13 Q And what is a deficiency judgment?</p> <p>14 A In the event that the judgment essentially</p> <p>15 falls short of what is due to pay the balance off,</p> <p>16 then there's a deficiency.</p> <p>17 Q So let's say, for example, if this</p> <p>18 foreclosure sale resulted in a net payment to the</p> <p>19 Randalls of, say, \$350,000 and let's say \$800,000</p> <p>20 was owed to U.S. Bank at the time, what would the</p> <p>21 deficiency amount be?</p> <p>22 MR. SYLVAN: Objection. Form.</p> <p>23 BY MR. LAING:</p> <p>24 Q And I don't want to confuse you on math or</p> <p>25 numbers. Would it be the difference between the</p>

<p>Page 13</p> <p>1 two?</p> <p>2 A Yes. Yes. I was just trying to calculate</p> <p>3 in my head.</p> <p>4 Q Okay. Okay. Let's go to Exhibit 3,</p> <p>5 please.</p> <p>6 A Sure.</p> <p>7 Q And Exhibit 3 is another document that was</p> <p>8 in the files of PHH Mortgage Corporation, and it was</p> <p>9 produced as PHH Mortgage 001147. Do you have that</p> <p>10 in front of you?</p> <p>11 A I do.</p> <p>12 Q This is a document called "Altisource Real</p> <p>13 Estate Valuation Services," correct?</p> <p>14 A Correct.</p> <p>15 Q It indicates on the top of the document</p> <p>16 that the borrower is Stacy Randall, and it relates</p> <p>17 to an address of 6116 Avocetridge Drive in Lithia,</p> <p>18 Florida, correct?</p> <p>19 A Correct.</p> <p>20 Q At the bottom of page 1 and the top of</p> <p>21 page 2, it describes the home owned by the Randalls,</p> <p>22 correct?</p> <p>23 A It does, yes.</p> <p>24 Q And it says at the bottom of page 1 that</p> <p>25 it is a seven-year-old single family residence,</p>	<p>Page 15</p> <p>1 referenced.</p> <p>2 MR. LAING: Yeah. That page was PHH</p> <p>3 Mortgage 000082.</p> <p>4 MR. SYLVAN: Thank you.</p> <p>5 BY MR. LAING:</p> <p>6 Q And this is a document entered by a court,</p> <p>7 on behalf of U.S. Bank and against Stacy Randall and</p> <p>8 Steven Randall, ordering several things; is that</p> <p>9 correct?</p> <p>10 A Yes.</p> <p>11 Q In paragraph 3 on page 2, it indicates</p> <p>12 that the Randalls owe U.S. Bank, at the time the</p> <p>13 document was entered by the court in 2019, the sum</p> <p>14 of \$858,671.62, correct?</p> <p>15 A Correct.</p> <p>16 Q Then on the next page, paragraph 6, it</p> <p>17 indicates that the court is ordering that the</p> <p>18 property be sold; is that correct?</p> <p>19 A Yes.</p> <p>20 Q Okay. Let's go to Exhibit 5, please,</p> <p>21 which is a document produced by PHH Mortgage</p> <p>22 Corporation with a Bates stamp of PHH0372. This was</p> <p>23 again a document produced by PHH Mortgage</p> <p>24 Corporation in this case. Can you tell me what this</p> <p>25 document is?</p>
<p>Page 14</p> <p>1 correct?</p> <p>2 A Yes.</p> <p>3 Q And would that indicate to you that when</p> <p>4 the Randalls purchased that home seven years</p> <p>5 earlier, they purchased it as a new home?</p> <p>6 A Yes.</p> <p>7 Q It goes on to say it's got 3,449 square</p> <p>8 feet of living space, correct?</p> <p>9 A Correct.</p> <p>10 Q It indicates it's got five bedrooms and</p> <p>11 three baths, correct?</p> <p>12 A Yes.</p> <p>13 Q Let's turn to page -- or Exhibit 4,</p> <p>14 please. Exhibit 4 is a document labeled "Uniform</p> <p>15 Final Judgment of Foreclosure Against Defendants,"</p> <p>16 and it's a document entered by the court. And if</p> <p>17 you look at the -- page 5 of that document, it</p> <p>18 appears to be signed by the judge on October 24,</p> <p>19 2019; is that correct?</p> <p>20 A Yes.</p> <p>21 MR. SYLVAN: Counsel, can I -- can I just</p> <p>22 ask what the Bates number is of that page,</p> <p>23 please?</p> <p>24 MR. LAING: That page?</p> <p>25 MR. SYLVAN: Yeah. That you just</p>	<p>Page 16</p> <p>1 A This is a residential contract as is for</p> <p>2 the sale and purchase, and it's indicating that the</p> <p>3 Randalls are the sellers. And I'm not sure -- yeah.</p> <p>4 It looks like Justin Alvarez and Kristen Alvarez are</p> <p>5 the buyers.</p> <p>6 Q Okay. And this is for the property</p> <p>7 located at 6116 Avocetridge Drive in Lithia,</p> <p>8 Florida, correct?</p> <p>9 A That is correct.</p> <p>10 Q And the amount of the purchase price</p> <p>11 listed on this offer to purchase is \$360,000,</p> <p>12 correct?</p> <p>13 A It appears that way, yes.</p> <p>14 Q And if you look at the last page of that</p> <p>15 document bearing Bates stamp Number PHH0383, it</p> <p>16 indicates that Stacy Randall and Steven Randall</p> <p>17 signed the offer to purchase on November 22, 2019,</p> <p>18 correct?</p> <p>19 A That is correct.</p> <p>20 Q If this offer to purchase went forward for</p> <p>21 this purchase price, there would be a deficiency of</p> <p>22 over \$500,000 due U.S. Bank; is that correct?</p> <p>23 A Yes.</p> <p>24 Q Let's go to Exhibit 6, please. Exhibit 6</p> <p>25 is a document produced by PHH Mortgage Corporation</p>

<p>Page 17</p> <p>1 in this case bearing a Bates stamp number of PHH</p> <p>2 Mortgage 000253. Can you tell me what this document</p> <p>3 is?</p> <p>4 A This is a handwritten hardship letter</p> <p>5 signed by Steven Randall, and I'm not sure if</p> <p>6 Mrs. Randall signed that. There appears to be</p> <p>7 another signature on there, but I'm not sure if</p> <p>8 that's her signature or not.</p> <p>9 Q Okay. And this document is dated May 13,</p> <p>10 2020, correct?</p> <p>11 A Correct.</p> <p>12 Q And on the top of it, it's captioned</p> <p>13 "Hardship Letter." Do you see that?</p> <p>14 A Yes.</p> <p>15 (Confidential portion redacted)</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 19</p> <p>1 A In some cases, yes.</p> <p>2 Q What's the process that was used in this</p> <p>3 matter by PHH Mortgage Corporation in evaluating</p> <p>4 this request for a short sale?</p> <p>5 A There are several -- several factors that</p> <p>6 have to be taken into consideration. First, we</p> <p>7 would receive this letter, take it into</p> <p>8 consideration, and then we would then communicate</p> <p>9 with the homeowner what the obligations are as far</p> <p>10 as going forward with a short sale.</p> <p>11 Hypothetically, if they had an agreement</p> <p>12 with a realtor and the numbers from the offer from</p> <p>13 the realtor -- if they had somebody that was</p> <p>14 interested in buying the property if the numbers all</p> <p>15 were in agreement and satisfied, our obligations on</p> <p>16 our end -- we would then continue with the short</p> <p>17 sale and follow through with any documentations</p> <p>18 waiting for information from the homeowner and the</p> <p>19 realtor and their attorneys to provide information</p> <p>20 to us to make sure all of the I's were dotted and</p> <p>21 the T's were crossed essentially.</p> <p>22 Q Is some of the information that's</p> <p>23 requested from the homeowner financial information</p> <p>24 pursuant to which the homeowner would need to</p> <p>25 establish a financial hardship?</p>
<p>Page 18</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 (End of redacted confidential portion)</p> <p>11 BY MR. LAING:</p> <p>12 Q So the letter asks for a short sale?</p> <p>13 A Correct.</p> <p>14 Q What is a short sale?</p> <p>15 A A short sale in -- at the time that the</p> <p>16 client goes into default is one of the options that</p> <p>17 is available in the event that they don't qualify</p> <p>18 for modification, and it allows them time to sell</p> <p>19 the property based on an offer that is agreeable</p> <p>20 between the servicer and the homeowner, meaning that</p> <p>21 they have to -- certain obligations have to be met</p> <p>22 financially. The numbers have to make sense. Long</p> <p>23 and short of it.</p> <p>24 Q Pursuant to a short sale, is the bank</p> <p>25 agreeing to waive the deficiency?</p>	<p>Page 20</p> <p>1 A Yes.</p> <p>2 Q In that process does PHH Mortgage</p> <p>3 Corporation request that the homeowner complete a</p> <p>4 form -- whether you call it an application or a</p> <p>5 declaration or affidavit or something to that</p> <p>6 effect -- where the homeowner discloses their</p> <p>7 assets?</p> <p>8 A Essentially, yes.</p> <p>9 Q And is it important for that statement to</p> <p>10 be accurate?</p> <p>11 A It is, yes.</p> <p>12 Q And by that statement, does the homeowner</p> <p>13 represent that what they're telling PHH Mortgage</p> <p>14 Corporation is in effect accurate, and, in fact, PHH</p> <p>15 Mortgage Corporation can rely on it?</p> <p>16 A Yes.</p> <p>17 Q Let's go to Exhibit 7, please, and at the</p> <p>18 same time I want you to look at Exhibit 8 because</p> <p>19 that's a clearer copy.</p> <p>20 A Yes.</p> <p>21 Q And Exhibit 7 was produced by PHH Mortgage</p> <p>22 Corporation in this case as PHH Mortgage000239, and</p> <p>23 Exhibit 8 was produced by PHH Mortgage Corporation</p> <p>24 as PHH0218.</p> <p>25 Now, let's go to Exhibit 7, and this is a</p>

<p>Page 21</p> <p>1 document that's titled "Mortgage Assistance</p> <p>2 Application," correct?</p> <p>3 A Yes.</p> <p>4 Q And then in the middle of the page, it</p> <p>5 asks for the account holder's name, and next to it</p> <p>6 it says on this document Stacy Randall with some of</p> <p>7 her identifying information, correct?</p> <p>8 A Correct.</p> <p>9 Q Then at the bottom of the page, it asks</p> <p>10 for information about the property, and Stacy</p> <p>11 lists on this form the property address is</p> <p>12 6116 Avocetridge Drive in Lithia, Florida, correct?</p> <p>13 A Correct.</p> <p>14 Q And then she says the property is</p> <p>15 currently an investment property, correct?</p> <p>16 A Yes.</p> <p>17 Q And then she says that the property is</p> <p>18 currently vacant, correct?</p> <p>19 A Yes.</p> <p>20 Q And she says I want to sell the property,</p> <p>21 correct?</p> <p>22 A Yes.</p> <p>23 Q She then -- it goes on to say that the</p> <p>24 property is listed for sale through a brokerage.</p> <p>25 She identifies the name of the broker and the</p>	<p>Page 23</p> <p>1 A Correct.</p> <p>2 Q She checked the box that indicates that</p> <p>3 there's been an increase in housing-related</p> <p>4 expenses, correct?</p> <p>5 A Correct.</p> <p>6 Q She checked the box that she's going</p> <p>7 through a divorce and a legal separation, correct?</p> <p>8 A Yes.</p> <p>9 Q She also checked the box that she's going</p> <p>10 through a business failure, correct?</p> <p>11 A Correct.</p> <p>12 Q And then on the bottom, she says husband</p> <p>13 has been disabled, correct?</p> <p>14 A Correct.</p> <p>15 Q Then on the next page at the top of the</p> <p>16 page, it asks the person completing the form for</p> <p>17 income information, correct?</p> <p>18 A Correct.</p> <p>19 Q And she indicated she has no income,</p> <p>20 right?</p> <p>21 A Right.</p> <p>22 Q And on the bottom of the page, it talks</p> <p>23 about current account holder assets. Do you see</p> <p>24 that?</p> <p>25 A I do.</p>
<p>Page 22</p> <p>1 broker's phone number, correct?</p> <p>2 A Correct.</p> <p>3 Q If you go to page 2 of the document, at</p> <p>4 the top it indicates that the hardship causing the</p> <p>5 mortgage challenges began in January of 2007,</p> <p>6 correct?</p> <p>7 A Correct.</p> <p>8 Q And Stacy indicates that the hardship is</p> <p>9 long term or permanent. Greater than six months,</p> <p>10 correct?</p> <p>11 A Correct.</p> <p>12 Q Then the next section talks about a</p> <p>13 description of the hardship, correct?</p> <p>14 A Correct.</p> <p>15 Q There's various boxes that the person</p> <p>16 completing the form can check, correct?</p> <p>17 A Correct.</p> <p>18 Q And Stacy checked the boxes that says</p> <p>19 she's unemployed and not receiving benefits,</p> <p>20 correct?</p> <p>21 A Correct.</p> <p>22 Q She checked the box that says that she's</p> <p>23 had a reduction in income. A hardship that has</p> <p>24 caused a decrease in income due to circumstances</p> <p>25 outside her control, correct?</p>	<p>Page 24</p> <p>1 Q And what's the purpose for asking -- a</p> <p>2 homeowner who's requesting that a bank waive a</p> <p>3 deficiency for their assets?</p> <p>4 A It is to -- to get a better understanding</p> <p>5 of their financial situation, and those numbers are</p> <p>6 taken into consideration when making a determination</p> <p>7 on what options may be available for them, whether</p> <p>8 it be a short sale if that's the best option or a</p> <p>9 modification -- different options available, and</p> <p>10 it's an assessment of what we can offer them.</p> <p>11 Q Is it also used in determining whether the</p> <p>12 bank should waive a significant deficiency?</p> <p>13 A It -- it does take into consideration that</p> <p>14 information as well, yes.</p> <p>15 Q In that area of the form captioned</p> <p>16 "Current Account Assets," the first box asks for the</p> <p>17 homeowner to indicate how much money they have in</p> <p>18 their checking account and cash on hand, correct?</p> <p>19 A Correct.</p> <p>20 Q And Stacy Randall indicated she had \$3,000</p> <p>21 of money in that category, correct?</p> <p>22 A Correct.</p> <p>23 Q It then asks the homeowner to tell the</p> <p>24 bank the total dollars in their savings account,</p> <p>25 correct?</p>

<p>Page 25</p> <p>1 A Correct.</p> <p>2 Q And Stacy Randall indicated that she had</p> <p>3 \$4,000 in her checking -- in her savings account at</p> <p>4 that time, correct?</p> <p>5 A Correct.</p> <p>6 Q The next area asks the homeowner to</p> <p>7 disclose their assets in money markets, stocks,</p> <p>8 bonds, and CDs and the value of that, correct?</p> <p>9 A That's -- yes.</p> <p>10 Q And what did Stacy indicate there?</p> <p>11 A There is nothing in that to indicate</p> <p>12 anything.</p> <p>13 Q The next box asks the homeowner to</p> <p>14 disclose the estimated value of real estate owned by</p> <p>15 the homeowner, correct?</p> <p>16 A Correct.</p> <p>17 Q And what did Stacy disclose there?</p> <p>18 A There is nothing there.</p> <p>19 Q And then there's a catch-all at the bottom</p> <p>20 that says other, correct?</p> <p>21 A Correct.</p> <p>22 Q And that would be any other assets that</p> <p>23 weren't in the categories listed above, correct?</p> <p>24 A Correct.</p> <p>25 Q And what did Stacy list there?</p>	<p>Page 27</p> <p>1</p> <p>2</p> <p>3</p> <p>4 (End of redacted confidential portion.)</p> <p>5 MS. SOLANO: Objection. Objection. Calls</p> <p>6 for a legal conclusion.</p> <p>7 BY MR. LAING:</p> <p>8 Q Let's go to Exhibit 9, please, and</p> <p>9 Exhibit 9 is a document that was produced by</p> <p>10 PHH Mortgage Corporation in this case with Bates</p> <p>11 Stamp Number PHH Mortgage 000162, correct?</p> <p>12 A Correct.</p> <p>13 Q And is that a closing statement for the</p> <p>14 sale of the Lithia, Florida, home owned by Stacy</p> <p>15 Randall and Steven Randall?</p> <p>16 A It is.</p> <p>17 Q And is it dated July 31, 2020?</p> <p>18 A It is.</p> <p>19 Q It indicates that the buyers at the top of</p> <p>20 page 1 are Justin Alvarez and Kristen Alvarez,</p> <p>21 correct?</p> <p>22 A Correct.</p> <p>23 Q Then it indicates in the middle of</p> <p>24 Exhibit 9 that the sale price for the property was</p> <p>25 \$395,000, correct?</p>
<p>Page 26</p> <p>1 A Zero.</p> <p>2 Q If you then turn to the next page of</p> <p>3 Exhibit 7, there's a category that says account</p> <p>4 holder's certification, correct?</p> <p>5 A Yes.</p> <p>6 Q It says it is certified and acknowledged</p> <p>7 that all of the information in this mortgage</p> <p>8 assistance application is truthful. Is that what it</p> <p>9 says?</p> <p>10 A It does, yes.</p> <p>11 Q And then in the next line, it says</p> <p>12 knowingly submitting false information may violate</p> <p>13 federal and other applicable law, correct?</p> <p>14 A Correct.</p> <p>15 Q Then at the bottom of the form, it again</p> <p>16 says by signing below I certify that all the</p> <p>17 information contained herein is truthful, correct?</p> <p>18 A Correct.</p> <p>19 Q And then did Stacy Randall sign the form?</p> <p>20 A She did.</p> <p>21 Q And what's the date of her signature?</p> <p>22 A I believe it's 5-13-2020.</p> <p>23 Q So May 13 of 2020?</p> <p>24 A Yes.</p> <p>25 (Confidential portion redacted.)</p>	<p>Page 28</p> <p>1 A Correct.</p> <p>2 Q And then there's various amounts that had</p> <p>3 to be paid out of that by the seller, including</p> <p>4 taxes and home owner's association fees and real</p> <p>5 estate commission fees and the like, correct?</p> <p>6 A Correct.</p> <p>7 Q And it indicates that the Randalls would</p> <p>8 receive a net amount of 337,225.08 from the sale,</p> <p>9 correct?</p> <p>10 A Correct.</p> <p>11 Q And that would be about \$500,000 less than</p> <p>12 what was owed to U.S. Bank on the property, correct?</p> <p>13 A Correct.</p> <p>14 Q And this closing document on page 3 was</p> <p>15 signed by Stacy Randall and Steven Randall on</p> <p>16 July 29, 2020, correct?</p> <p>17 A Correct.</p> <p>18 Q Now, go to Exhibit 10, and before we talk</p> <p>19 (Confidential redacted portion.)</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>



<p style="text-align: right;">Page 29</p> <p>1 (End of confidential redacted portion.)</p> <p>2 Q And if you look at Exhibit 10, is that a</p> <p>3 copy of the paperwork relating to the approval of</p> <p>4 the short sale and the waiver of the deficiency?</p> <p>5 A Yes.</p> <p>6 Q Exhibit 10 is dated June 19 of 2020,</p> <p>7 correct?</p> <p>8 A It is, yes.</p> <p>9 Q And it's addressed -- well, it's sent by</p> <p>10 PHH Mortgage Corporation to Stacy Randall and Steven</p> <p>11 Randall in Stoughton, Wisconsin, correct?</p> <p>12 A Correct.</p> <p>13 Q And it's sent to them at the address of</p> <p>14 1972 Barber Drive, Unit 3, correct?</p> <p>15 A Correct.</p> <p>16 Q And it indicates in the right box that</p> <p>17 this relates to the property address of</p> <p>18 6116 Avocetridge Drive in Lithia, Florida, correct?</p> <p>19 A Correct.</p> <p>20 Q Then in the first paragraph of the letter,</p> <p>21 it says: "Congratulations. PHH Mortgage Services</p> <p>22 acting on behalf of U.S. Bank, et cetera, has</p> <p>23 approved the short sale payoff on the above</p> <p>24 referenced account in the amount of \$336,290.17,"</p> <p>25 correct?</p>	<p style="text-align: right;">Page 31</p> <p>1 may already have taken as of the date of the</p> <p>2 response to this letter; is that correct?</p> <p>3 A Correct.</p> <p>4 (Confidential redacted portion.)</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11 (End of confidential redacted portion.)</p> <p>12 Q Then it goes on in this document to</p> <p>13 reference balance waiver. Do you see that?</p> <p>14 A I do.</p> <p>15 Q And it says: "To the extent not</p> <p>16 discharged by any bankruptcy process, the remaining</p> <p>17 deficiency after acceptance of the short sale</p> <p>18 proceeds is \$451,919.07." Do you see that?</p> <p>19 A I do.</p> <p>20 Q It says: "PHH Mortgage Services has</p> <p>21 approved the short sale offer as full and final</p> <p>22 satisfaction of the mortgage obligation for this</p> <p>23 lien. PHH Mortgage Services agrees to waive the</p> <p>24 remaining balance due on the referenced mortgage or</p> <p>25 such waiver as required by state law, and,</p>
<p style="text-align: right;">Page 30</p> <p>1 A Correct.</p> <p>2 Q Which is approximately the same amount as</p> <p>3 the Randalls were to receive in a net amount from</p> <p>4 the sale of the property, correct?</p> <p>5 A Correct.</p> <p>6 Q Then it says on the bottom of the --</p> <p>7 page 10: "What needs to be understood. Paragraph</p> <p>8 1: We have completed the review of the application</p> <p>9 for assistance and the financial information</p> <p>10 provided. The account is approved for a short sale</p> <p>11 payoff in the sum of \$336,290.17," correct?</p> <p>12 A Correct.</p> <p>13 Q Then if you go to the page bearing a Bates</p> <p>14 Stamp Number 000176, there's a section toward the</p> <p>15 bottom captioned "Legal Action." Do you see that?</p> <p>16 A I do.</p> <p>17 Q And it says that upon PHH Mortgage</p> <p>18 Corporation's timely receipt of the entire payoff</p> <p>19 amount, evidence of satisfaction of the above</p> <p>20 conditions, and a copy of this letter properly</p> <p>21 signed by each of the above-named account holders,</p> <p>22 PHH Mortgage Services will execute a release</p> <p>23 satisfaction and a discharge of the property lien.</p> <p>24 If necessary, PHH Mortgage Services will file a</p> <p>25 withdrawal in connection with any legal action it</p>	<p style="text-align: right;">Page 32</p> <p>1 therefore, PHH Mortgage Services will release the</p> <p>2 account holder from further obligation upon</p> <p>3 successful completion of the short sale." Do you</p> <p>4 see that?</p> <p>5 A I do.</p> <p>6 Q This document is then signed by Stacy</p> <p>7 Randall on July 29, 2020, correct?</p> <p>8 A Correct.</p> <p>9 Q Then on the page Bates labeled 000190 of</p> <p>10 Exhibit 10, there's a document that's captioned</p> <p>11 "Short Sale Affidavit." Do you see that?</p> <p>12 A I do.</p> <p>13 Q And that affidavit was signed by Stacy</p> <p>14 Randall on July 26, 2020, correct?</p> <p>15 A Correct.</p> <p>16 Q And in this affidavit Ms. Randall</p> <p>17 represented in paragraph G that she is certifying</p> <p>18 under penalty of perjury that to the best of her</p> <p>19 knowledge and belief a signatory who makes a</p> <p>20 negligent or intentional misrepresentation agrees to</p> <p>21 indemnify the servicer and the investor for any and</p> <p>22 all loss resulting from the misrepresentation,</p> <p>23 including but not limited to repayment of the</p> <p>24 amounts of the reduced payoff of the mortgage; is</p> <p>25 that correct?</p>



<p>Page 33</p> <p>1 A Yes.</p> <p>2 Q And then on the next page in the first</p> <p>3 paragraph on the top, Stacy Randall also certified</p> <p>4 under penalty of perjury that she understands that a</p> <p>5 misrepresentation may subject her to civil and/or</p> <p>6 criminal liability, correct?</p> <p>7 A Correct.</p> <p>8 (Confidential portion redacted.)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14 (End of confidential redacted portion.)</p> <p>15 MR. SYLVAN: Objection. Calls for a legal</p> <p>16 conclusion.</p> <p>17 BY MR. LAING:</p> <p>18 Q Did the sale of the property in Lithia,</p> <p>19 Florida, from the Randalls to the Alvarezes close?</p> <p>20 A It did.</p> <p>21 Q And did PHH Mortgage Corporation receive</p> <p>22 \$337,225.08 from the sale?</p> <p>23 A We did, yes.</p> <p>24 Q And did PHH Mortgage Corporation waive the</p> <p>25 remaining balance owed by Stacy Randall and Steven</p>	<p>Page 35</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5 (End of redacted confidential portion.)</p> <p>6 BY MR. LAING:</p> <p>7 (Confidential portion redacted.)</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 (End of confidential portion redacted.)</p> <p>17 BY MR. LAING:</p> <p>18 (Confidential portion redacted.)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>Page 34</p> <p>1 Randall to U.S. Bank in the sum of \$451,919.07?</p> <p>2 A We did, yes.</p> <p>3 (Confidential portion redacted.)</p> <p>4</p> <p>5</p> <p>6</p> <p>7 (End of confidential redacted portion.)</p> <p>8 Q Did Stacy Randall tell PHH Mortgage</p> <p>9 Corporation, either in the Mortgage Assistance</p> <p>10 Application form or in any other manner, that as of</p> <p>11 the date she signed that form, May 13 of 2020, she</p> <p>12 owned stock in a corporation known as Windy Waters,</p> <p>13 Inc. --</p> <p>14 MR. SYLVAN: Objection. Form.</p> <p>15 MR. LAING: Let me just finish the</p> <p>16 question.</p> <p>17 BY MR. LAING:</p> <p>18 Q Did Stacy Randall tell PHH Mortgage</p> <p>19 Corporation, either in the application that we've</p> <p>20 marked as Exhibit 7 or in any other manner, that as</p> <p>21 of the date she signed that certification, May 13,</p> <p>22 2020, that she owned 232.75 shares of Class A common</p> <p>23 stock and 1,952.7568 shares of Class B common stock</p> <p>24 (Confidential portion redacted.)</p> <p>25</p>	<p>Page 36</p> <p>1</p> <p>2 (End of confidential portion redacted.)</p> <p>3 BY MR. LAING:</p> <p>4 (Confidential portion redacted.)</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 (End of confidential portion redacted.)</p> <p>17 BY MR. LAING:</p> <p>18 Q Please go to Exhibit 12. This is a</p> <p>19 closing statement from the sale of a property from</p> <p>20 Stacy Randall and Steven Randall to a Melissa Siems,</p> <p>21 S-i-e-m-s, and it's dated July 24, 2020. Do you see</p> <p>22 that?</p> <p>23 A I do.</p> <p>24 Q And you see that its property address is</p> <p>25 1972 Barber Drive, Unit 3, Stoughton, Wisconsin?</p>

<p style="text-align: right;">Page 37</p> <p>1 A Yes.</p> <p>2 Q And you see that --</p> <p>3 MR. SYLVAN: Counsel, sorry to interrupt.</p> <p>4 Can I just ask what the -- the Bates stamp is</p> <p>5 on that?</p> <p>6 MR. LAING: Certainly. It's Windy</p> <p>7 0008382.</p> <p>8 BY MR. LAING:</p> <p>9 Q And the address of that property is the</p> <p>10 same address to which the approval of a short sale</p> <p>11 payoff marked as Exhibit 10 was sent to, correct?</p> <p>12 A It is, yes.</p> <p>13 Q And this closing statement indicates that</p> <p>14 Stacy Randall and her husband at the time sold the</p> <p>15 property for \$486,000, correct?</p> <p>16 A Correct.</p> <p>17 Q Then if you look at the -- page 3, it</p> <p>18 indicates on the bottom left that the net amount</p> <p>19 from that sale being paid to Stacy Randall and</p> <p>20 Steven Randall is \$51,966.41. Do you see that?</p> <p>21 A I do.</p> <p>22 (Confidential portion redacted.)</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 39</p> <p>1 that she determined the fair market value of that</p> <p>2 property as of May 13, 2020. Do you see that?</p> <p>3 A I do.</p> <p>4 Q And, again, that's the date of the</p> <p>5 certification completed by Stacy Randall, correct?</p> <p>6 A Yes.</p> <p>7 Q It then goes on to say: "In summary the</p> <p>8 fair market value of the appraised items totals</p> <p>9 \$29,223." Do you see that?</p> <p>10 A I do.</p> <p>11 Q And if you go toward the end of the</p> <p>12 report, there's a bunch of photos of all of the</p> <p>13 items that were appraised, including jewelry and</p> <p>14 coins and silver bars and other types of precious</p> <p>15 metals. Do you see that?</p> <p>16 A I do.</p> <p>17 (Confidential portion redacted.)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 38</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9 (End of confidential portion redacted.)</p> <p>10 Q Turn to Exhibit 13, please, which is the</p> <p>11 document called "Appraisal Report" authored by Laura</p> <p>12 Duguid, D-u-g-u-i-d, dated October 2, 2023, and the</p> <p>13 appraisal report is captioned "Precious Metals and</p> <p>14 Jewelry Fair Market Value Appraisal." Do you see</p> <p>15 that?</p> <p>16 A I do.</p> <p>17 Q If you go to page 3 of the document,</p> <p>18 there's a letter to David Palay dated October 2,</p> <p>19 2003, where Stacy Randall's expert Laura Duguid</p> <p>20 indicates that at Mr. Palay's request on</p> <p>21 September 25, 2023, she conducted an appraisal</p> <p>22 inspection of personal property belonging to Stacy</p> <p>23 Randall. Do you see that?</p> <p>24 A I do.</p> <p>25 Q And then in the next paragraph, it says</p>	<p style="text-align: right;">Page 40</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9 (End of confidential portion redacted.)</p> <p>10 MR. SYLVAN: Objection. Calls for a legal</p> <p>11 conclusion. Speculation. Foundation.</p> <p>12 BY MR. LAING:</p> <p>13 (Confidential portion redacted.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24 (End of confidential portion redacted.)</p> <p>25 MR. LAING: Those are all my questions.</p>

<p style="text-align: right;">Page 41</p> <p>1 Thank you.</p> <p>2 MR. SYLVAN: No questions. Thank you.</p> <p>3 MR. LAING: We're done. Thank you for</p> <p>4 your time.</p> <p>5 THE WITNESS: Thank you.</p> <p>6 MS. SOLANO: Read or waive?</p> <p>7 THE WITNESS: I'll defer to you and your</p> <p>8 judgment.</p> <p>9 MS. SOLANO: We can read.</p> <p>10 THE VIDEOGRAPHER: This marks the end of</p> <p>11 today's deposition. The time is 10:52. We're</p> <p>12 going off the record.</p> <p>13 (Thereupon, the deposition concluded at</p> <p>14 10:52 a.m.)</p> <p>15 (Reading and signing the deposition was</p> <p>16 not waived.)</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 43</p> <p style="text-align: center;">C E R T I F I C A T E</p> <p>1 THE STATE OF FLORIDA</p> <p>2 COUNTY OF PALM BEACH.</p> <p>3</p> <p>4</p> <p>5 I, GINA R. GRANT, do hereby certify that</p> <p>6 I was authorized to and did stenographically report the</p> <p>7 foregoing deposition; and that the transcript is a true</p> <p>8 and correct transcription of the testimony given by the</p> <p>9 witness.</p> <p>10 I further certify that I am not a</p> <p>11 relative, employee or attorney of any of the</p> <p>12 parties, nor am I a relative or employee of any of</p> <p>13 the parties' attorneys or counsel connected with the</p> <p>14 action, nor am I financially interested in this</p> <p>15 action.</p> <p>16 DATED, this 12th day of January, 2024.</p> <p>17</p> <p>18</p> <p>19</p> <p>20 <u>Gina Grant</u></p> <p>21 Notary Public - State of Florida</p> <p>22 My Commission No. GG341539</p> <p>23 Expires: June 24, 2023</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 42</p> <p>1 CERTIFICATE OF OATH</p> <p>2</p> <p>3 STATE OF FLORIDA</p> <p>4 COUNTY OF PALM BEACH</p> <p>5</p> <p>6 I, GINA R. GRANT, Notary Public, State of</p> <p>7 Florida at Large, do hereby certify that LOUISE PLASSE</p> <p>8 personally appeared before me and was duly sworn.</p> <p>9 WITNESS my hand and seal this 12th day of</p> <p>10 January, 2024.</p> <p>11</p> <p>12</p> <p>13 <u>GINA R. GRANT</u></p> <p>14 Notary Public - State of Florida</p> <p>15 My Commission No. GG341539</p> <p>16 Expires: June 24, 2023</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	

**WORD INDEX**

&lt; \$ &gt;

\$29,223 39:9

\$3,000 24:20

\$336,290.17 29:24  
30:11

\$337,225.08 33:22

\$350,000 12:19

\$360,000 16:11

\$395,000 27:25

\$4,000 25:3

\$451,919.07 31:18  
34:1

\$486,000 37:15

\$500,000 16:22 28:11

\$500,750 10:4 11:4

\$51,966.41 37:20

\$788,209.24 12:1

\$793,535.07 10:21  
11:4

\$800,000 12:19

\$858,671.62 15:14

&lt; 0 &gt;

000001 9:18

000042 10:9

000082 15:3

000162 27:11

000176 30:14

000190 32:9

000253 17:2

0008382 37:7

001147 13:9

&lt; 1 &gt;

1 3:11 4:16 7:3 8:1  
10:19, 20 11:7, 14, 19  
13:20, 24 27:20 30:8

1,952.7568 34:23

10 1:18 3:20 4:8  
28:18 29:2, 6 30:7  
32:10 37:11

10:01 1:18 4:8, 20

10:52 1:18 41:11, 14

1000 2:3

10th 4:19

11 3:21 11:22

111 2:8

12 3:22 36:18

12th 42:9 43:16

13 3:13, 23 4:16  
17:9 26:23 34:11, 21  
38:10 39:2

14 3:14

1400 2:8

1440 2:11

16 3:15

17 3:16

1700 2:3

19 29:6

1900 1:19 4:6, 24

1972 29:14 36:25

&lt; 2 &gt;

2 3:12 9:15, 25  
10:18 13:21 15:11  
22:3 38:12, 18

20 3:17, 18 11:13, 24

2003 38:19

2007 8:11, 25 10:25  
22:52017 10:15, 20, 25  
11:5

2018 11:13, 20, 24

2019 6:9 14:19  
15:13 16:172020 17:10 26:23  
27:17 28:16 29:6  
32:7, 14 34:11, 22  
36:21 39:22023 38:12, 21 42:14  
43:212024 1:18 4:8, 19  
42:10 43:16

22 16:17

23 10:15 11:5

232.75 34:22

24 14:18 36:21  
42:14 43:21

25 38:21

26 32:14

27 3:19

29 3:20 28:16 32:7

&lt; 3 &gt;

3 3:13 12:3 13:4, 7  
15:11 28:14 29:14

36:25 37:17 38:17

3,449 14:7

31 27:17

33301-4126 2:12

337,225.08 28:8

34 3:21

350 2:11

37 3:22

38 3:23

&lt; 4 &gt;

4 3:11, 12, 13, 14, 15,  
16, 17, 18, 19, 20, 21,  
22, 23 7:11 14:13, 14

&lt; 5 &gt;

5 3:5, 15 7:11 14:17  
15:20

5-13-2020 26:22

53202 2:4

53202-4870 2:8

&lt; 6 &gt;

6 3:16 15:16 16:24  
6116 8:17 13:17  
16:7 21:12 29:18

&lt; 7 &gt;

7 3:11, 17 20:17, 21,  
25 26:3 34:20  
777 1:19 4:6, 23

&lt; 8 &gt;

8 3:18 20:18, 23

&lt; 9 &gt;

9 3:12, 19 11:16  
27:8, 9, 24

&lt; A &gt;

a.m 1:18 4:9, 20  
41:14

ability 7:12

above-entitled 4:4

above-named 30:21

acceptance 31:17

account 21:5 23:23

24:16, 18, 24 25:3

26:3 29:24 30:10, 21

32:2

accurate 20:10, 14

acknowledged 26:6

acting 29:22

action 7:4 30:15, 25  
43:14, 15address 8:16 13:17  
21:11 29:13, 17  
36:24 37:9, 10

addressed 29:9

affidavit 20:5 32:11,  
13, 16

age 4:13 5:13

agreeable 18:19

agreeing 18:25

Agreement 3:21, 22  
10:14 19:11, 15

agrees 31:23 32:20

al 4:22

allows 18:18

Altisource 3:13  
13:12

Alvarez 16:4 27:20

Alvarezes 33:19

amended 11:18

amount 10:4, 20  
11:3 12:21 16:10  
28:8 29:24 30:2, 3,  
19 37:18

amounts 28:2 32:24

analyst 6:3

and/or 33:5

answer 7:21 9:8

APPEARANCES 2:1

appeared 42:8

appears 14:18 16:13  
17:6

applicable 26:13

Application 3:17, 18  
20:4 21:2 26:8 30:8  
34:10, 19

apply 9:7

Appraisal 3:23

38:11, 13, 14, 21

appraised 39:8, 13

Approval 3:20 29:3  
37:10

approved 29:23

30:10 31:21

approximately 30:2  
area 24:15 25:6  
asking 7:20, 21 8:9  
12:9 24:1  
asks 18:12 21:5, 9  
23:16 24:16, 23 25:6,  
13  
assessment 24:10  
assets 20:7 23:23  
24:3, 16 25:7, 22  
assigned 8:25  
Assistance 3:17, 18  
21:1 26:8 30:9 34:9  
association 28:4  
attorney 43:11  
attorneys 19:19  
43:13  
authored 38:11  
authorized 43:6  
available 18:17 24:7,  
9  
Avenue 2:8  
Avocetridge 8:17  
13:17 16:7 21:12  
29:18  
aware 8:3, 18  
  
< B >  
back 11:7  
balance 12:15 31:13,  
24 33:25  
Bank 6:24 9:1 11:9,  
25 12:4, 9, 20 15:7,  
12 16:22 18:24 24:2,  
12, 24 28:12 29:22  
34:1  
bankruptcy 31:16  
Bank's 12:9  
Barber 29:14 36:25  
bars 39:14  
based 18:19  
Bates 9:17 10:8  
14:22 15:22 16:15  
17:1 27:10 30:13  
32:9 37:4  
baths 14:11  
Beach 1:19 4:7, 24  
42:4 43:3  
bearing 16:15 17:1

30:13  
bedrooms 14:10  
began 22:5  
BEHALF 2:2, 6, 10  
4:2 5:5, 7 7:14, 22  
15:7 29:22  
belief 32:19  
believe 26:22  
belonging 38:22  
benefits 22:19  
Benny 2:14 4:25  
best 7:12 24:8 32:18  
better 24:4  
BOERNER 2:3  
bonds 25:8  
borrower 13:16  
bottom 13:20, 24  
21:9 23:12, 22 25:19  
26:15 30:6, 15 37:18  
Boulevard 2:11  
box 22:22 23:2, 6, 9  
24:16 25:13 29:16  
boxes 22:15, 18  
broker 21:25  
brokerage 21:24  
broker's 22:1  
bunch 39:12  
BURR 2:11  
business 6:15, 21  
23:10  
buyers 16:5 27:19  
buying 19:14  
  
< C >  
calculate 13:2  
call 9:9 20:4  
called 9:16 10:13  
13:12 38:11  
Calls 27:5 33:15  
40:10  
CANNON 2:6  
capacity 6:17, 19  
7:17  
captioned 17:12  
24:15 30:15 32:10  
38:13  
case 4:23 7:5, 6 8:2  
9:25 15:24 17:1  
20:22 27:10

cases 19:1  
cash 24:18  
catch-all 25:19  
categories 25:23  
category 24:21 26:3  
cause 4:4, 14 5:14  
caused 22:24  
causing 22:4  
CDs 25:8  
certain 18:21  
Certainly 37:6  
CERTIFICATE 42:1  
certification 26:4  
34:21 39:5  
certified 26:6 33:3  
certify 26:16 42:7  
43:5, 10  
certifying 32:17  
cetera 29:22  
challenges 22:5  
check 22:16  
checked 22:18, 22  
23:2, 6, 9  
checking 24:18 25:3  
circumstances 22:24  
City 4:6  
civil 7:4 33:5  
claim 12:8, 9  
Class 34:22, 23  
clause 12:4  
clearer 20:19  
client 18:16  
close 33:19  
Closing 3:19, 22  
27:13 28:14 36:19  
37:13  
coins 39:14  
come 9:8  
commencing 4:8  
commission 28:5  
42:14 43:20  
common 34:22, 23  
communicate 19:8  
companies 6:23  
Complaint 3:12 9:16  
11:8, 17  
complete 20:3  
completed 30:8 39:5  
completing 22:16

23:16  
completion 32:3  
concluded 41:13  
conclusion 27:6  
33:16 40:11  
conditions 30:20  
conducted 38:21  
Confidential 3:7  
17:15 18:10 26:25  
27:4 28:19 29:1  
31:4, 11 33:8, 14  
34:3, 7, 24 35:5, 7, 16,  
18 36:2, 4, 16 37:22  
38:9 39:17 40:9, 13,  
24  
confuse 12:24  
Congratulations  
29:21  
connected 43:13  
connection 8:12 9:4  
30:25  
consideration 19:6, 8  
24:6, 13  
contain 10:2  
contained 26:17  
continue 19:16  
Contract 3:15 16:1  
control 22:25  
copy 20:19 29:3  
30:20  
corporate 6:11 7:10  
8:7  
CORPORATION  
2:10 5:10 6:1, 5, 7,  
12, 24 7:5, 10, 14, 16,  
22 8:2, 7 13:8 15:22,  
24 16:25 19:3 20:3,  
14, 15, 22, 23 27:10  
29:10 33:21, 24 34:9,  
12, 19  
Corporation's 6:15  
9:3 30:18  
correct 6:12 9:1  
10:5, 6, 16, 17, 22  
11:5, 6, 11, 12, 14, 20,  
21 12:1, 11 13:13, 14,  
18, 19, 22 14:1, 8, 9,  
11, 19 15:9, 14, 15, 18  
16:8, 9, 12, 18, 19, 22  
17:10, 11 18:13 21:2,

7, 8, 12, 13, 15, 18, 21  
 22:1, 2, 6, 7, 10, 11, 13,  
 14, 16, 17, 20, 21, 25  
 23:1, 4, 5, 7, 10, 11, 13,  
 14, 17, 18 24:18, 19,  
 21, 22, 25 25:1, 4, 5, 8,  
 15, 16, 20, 21, 23, 24  
 26:4, 13, 14, 17, 18  
 27:11, 12, 21, 22, 25  
 28:1, 5, 6, 9, 10, 12, 13,  
 16, 17 29:7, 11, 12, 14,  
 15, 18, 19, 25 30:1, 4,  
 5, 11, 12 31:2, 3 32:7,  
 8, 14, 15, 25 33:6, 7  
 37:11, 15, 16 39:5  
 43:8  
**counsel** 5:2, 10  
 14:21 37:3 43:13  
**County** 4:7 42:4  
 43:3  
**COURT** 1:2 4:4, 25  
 11:24 12:5, 9 14:16  
 15:6, 13, 17  
**cover** 3:7  
**criminal** 33:6  
**crossed** 19:21  
**current** 23:23 24:16  
**currently** 21:15, 18  
**customer** 9:13

## &lt; D &gt;

**daily** 6:21  
**DATE** 1:18 4:19  
 11:23 26:21 31:1  
 34:11, 21 39:4  
**dated** 17:9 27:17  
 29:6 36:21 38:12, 18  
 43:16  
**David** 38:18  
**day** 42:9 43:16  
**DEAN** 2:9 5:4  
**December** 11:13, 24  
**declaration** 20:5  
**decrease** 22:24  
**default** 9:13 11:1  
 18:16  
**defaulted** 11:18  
**Defendants** 1:9, 15  
 2:6 3:11, 12, 13, 14,

15, 17, 18, 19, 20, 21,  
 22, 23 4:2 5:5 14:15  
**Defendant's** 3:16  
 4:16  
**defer** 41:7  
**deficiency** 12:10, 13,  
 16, 21 16:21 18:25  
 24:3, 12 29:4 31:17  
**DEJONG** 2:6  
**demanding** 12:5  
**DEPOSITION** 1:14  
 4:1, 21 5:5 7:4  
 41:11, 13, 15 43:7  
**describe** 6:14  
**describes** 13:21  
**description** 22:13  
**designated** 6:11  
**designee** 7:10  
**determination** 24:6  
**determined** 39:1  
**determining** 24:11  
**DEUREN** 2:3  
**difference** 12:25  
**different** 24:9  
**Direct** 3:5 5:16  
**disabled** 23:13  
**discharge** 30:23  
**discharged** 31:16  
**disclose** 25:7, 14, 17  
**discloses** 20:6  
**discovery** 4:3  
**DISTRICT** 1:2  
**divorce** 23:7  
**document** 7:2, 7  
 9:16, 22 10:8, 13, 18  
 11:23 13:7, 12, 15  
 14:14, 16, 17 15:6, 13,  
 21, 23, 25 16:15, 25  
 17:2, 9 21:1, 6 22:3  
 27:9 28:14 31:12  
 32:6, 10 38:11, 17  
**documentations** 19:17  
**documents** 7:2 8:3, 6  
**dollars** 24:24  
**Dorlouis** 2:14 4:25  
**dotted** 19:20  
**Drive** 1:19 4:6, 23  
 8:17 13:17 16:7  
 21:12 29:14, 18  
 36:25

**due** 11:19 12:15  
 16:22 22:24 31:24  
**Duguid** 38:12, 19  
**D-u-g-u-i-d** 38:12  
**duly** 4:14 5:14 42:8  
  
 < E >  
**earlier** 9:6 14:5  
**East** 2:8, 11  
**effect** 20:6, 14  
**either** 34:9, 19  
**employed** 5:24, 25  
**employee** 43:11, 12  
**enter** 12:5, 10  
**entered** 14:16 15:6,  
 13  
**ENTERPRISES** 1:7  
**entire** 30:18  
**ESQUIRE** 2:4, 9, 12  
**essentially** 12:14  
 19:21 20:8  
**establish** 19:25  
**Estate** 3:13 13:13  
 25:14 28:5  
**estimated** 25:14  
**et** 4:22 29:22  
**evaluating** 19:3  
**event** 12:14 18:17  
**evidence** 4:3 30:19  
**exact** 6:18  
**EXAMINATION**  
 5:16  
**example** 12:17  
**execute** 30:22  
**Exhibit** 3:11, 12, 13,  
 14, 15, 16, 17, 18, 19,  
 20, 21, 22, 23 4:16  
 7:3 8:1 9:15, 21, 24,  
 25 10:7 11:8 13:4, 7  
 14:13, 14 15:20  
 16:24 20:17, 18, 21,  
 23, 25 26:3 27:8, 9,  
 24 28:18 29:2, 6  
 32:10 34:20 36:18  
 37:11 38:10  
**expenses** 23:4  
**expert** 38:19  
**Expires** 42:14 43:21  
**extent** 31:15

## &lt; F &gt;

**fact** 11:3 20:14  
**factors** 19:5  
**failing** 11:19  
**failure** 23:10  
**Fair** 38:14 39:1, 8  
**falls** 12:15  
**false** 26:12  
**familiar** 8:13  
**family** 13:25  
**far** 19:9  
**federal** 26:13  
**fees** 28:4, 5  
**feet** 14:8  
**file** 30:24  
**filed** 11:9, 13, 23  
**files** 13:8  
**Final** 3:14 14:15  
 31:21  
**Financial** 5:25 6:5, 7  
 19:23, 25 24:5 30:9  
**financially** 18:22  
 43:14  
**finish** 34:15  
**first** 4:13 5:13 7:2  
 19:6 24:16 29:20  
 33:2  
**five** 14:10  
**Flagler** 1:19 4:6, 23  
**Florida** 1:19 2:12  
 4:5, 7, 24 8:13, 18, 20,  
 21 10:1 13:18 16:8  
 21:12 27:14 29:18  
 33:19 42:3, 7, 13  
 43:2, 20  
**follow** 19:17  
**follows** 4:15 5:15  
**Foreclosure** 3:12, 14  
 9:16 11:9 12:6, 18  
 14:15  
**foregoing** 43:7  
**Form** 12:22 20:4  
 21:11 22:16 23:16  
 24:15 26:15, 19  
 34:10, 11, 14  
**FORMAN** 2:11  
**Fort** 2:12  
**forward** 16:20 19:10  
**Foundation** 40:11



**front** 7:1 8:1 9:18  
10:11 13:10  
**full** 5:20 31:21  
**further** 32:2 43:10

< G >

**general** 9:10  
**generally** 6:14, 16  
**GG341539** 42:14  
43:20  
**Gina** 1:21 4:4 5:1  
42:6, 13 43:5, 19  
**given** 43:8  
**go** 10:18 11:7, 16, 22  
12:3 13:4 15:20  
16:24 20:17, 25 22:3  
27:8 28:18 30:13  
36:18 38:17 39:11  
**goes** 14:7 18:16  
21:23 31:12 39:7  
**going** 7:15 8:9  
19:10 23:6, 9 41:12  
**Good** 5:18, 19  
**Grant** 1:21 4:4 5:1  
42:6, 13 43:5, 19  
**Greater** 22:9  
**guidelines** 9:11

< H >

**hand** 24:18 42:9  
**Handwritten** 3:16  
17:4  
**Hardship** 3:16 17:4,  
13 19:25 22:4, 8, 13,  
23  
**head** 13:3  
**header** 11:14  
**held** 4:23  
**holder** 23:23 32:2  
**holders** 30:21  
**holder's** 21:5 26:4  
**HOLLMAN** 2:6  
**home** 8:12 13:21  
14:4, 5 27:14 28:4  
**homeowner** 9:9  
18:20 19:9, 18, 23, 24  
20:3, 6, 12 24:2, 17,  
23 25:6, 13, 15  
**housing-related** 23:3

**husband** 8:11, 24  
23:12 37:14  
**Hypothetically** 19:11

< I >

**identification** 4:17  
**IDENTIFIED** 3:10  
**identifies** 21:25  
**identifying** 21:7  
**important** 20:9  
**include** 9:12  
**including** 28:3 32:23  
39:13  
**income** 22:23, 24  
23:17, 19  
**increase** 23:3  
**indemnify** 32:21  
**indicate** 10:24 11:2  
14:3 24:17 25:10, 11  
**indicated** 23:19  
24:20 25:2  
**indicates** 10:19  
11:17 12:4 13:15  
14:10 15:11, 17  
16:16 22:4, 8 23:2  
27:19, 23 28:7 29:16  
37:13, 18 38:20  
**indicating** 16:2  
**individual** 7:17  
**individually** 7:21  
**information** 10:2  
19:18, 19, 22, 23 21:7,  
10 23:17 24:14 26:7,  
12, 17 30:9  
**initial** 11:1  
**initially** 8:24 11:4  
**inquire** 9:9  
**inspection** 38:22  
**institutional** 7:15  
**insufficient** 12:8  
**intentional** 32:20  
**interested** 19:14  
43:14  
**interrupt** 37:3  
**introduce** 5:2  
**investment** 21:15  
**investor** 32:21  
**investors** 6:20  
**I's** 19:20

**issued** 8:2  
**issues** 9:9, 12  
**items** 39:8, 13  
**its** 36:24

< J >

**January** 1:18 4:8, 19  
10:15 11:5 22:5  
42:10 43:16  
**Jewelry** 38:14 39:13  
**judge** 14:18  
**Judgment** 3:14 12:5,  
10, 13, 14 14:15 41:8  
**July** 27:17 28:16  
32:7, 14 36:21  
**June** 29:6 42:14  
43:21  
**Justin** 16:4 27:20

< K >

**KIESLER** 1:7  
**know** 6:18  
**knowingly** 26:12  
**knowledge** 7:16  
32:19  
**known** 34:12  
**Kristen** 16:4 27:20

< L >

**labeled** 10:8 14:14  
32:9  
**LAING** 2:6, 9 3:5  
5:4, 17 12:23 14:24  
15:2, 5 18:11 27:7  
33:17 34:15, 17 35:6,  
17 36:3, 17 37:6, 8  
40:12, 25 41:3  
**Large** 4:6 8:3 42:7  
**Las** 2:11  
**l-a-s-s-e** 5:23  
**Lauderdale** 2:12  
**Laura** 38:11, 19  
**law** 26:13 31:25  
**lawful** 4:13 5:13  
**left** 37:18  
**legal** 23:7 27:6  
30:15, 25 33:15  
40:10

**Letter** 3:16 17:4, 13  
18:12 19:7 29:20  
30:20 31:2 38:18  
**liability** 33:6

**lien** 30:23 31:23

**limited** 32:23

**line** 26:11

**list** 25:25

**listed** 7:11 16:11  
21:24 25:23

**lists** 21:11

**Lithia** 8:13, 17, 20  
10:1 13:17 16:7  
21:12 27:14 29:18  
33:18

**living** 14:8

**LLC** 1:7

**LLP** 2:11

**loan** 6:3 8:10, 14, 23  
9:5, 7, 11, 25 10:3, 4,  
13

**loans** 6:17, 19

**located** 8:12 16:7

**Long** 18:22 22:9

**Look** 9:15 14:17  
16:14 20:18 29:2  
37:17

**looks** 16:4

**loss** 32:22

**LOUISE** 1:14 3:4  
4:1, 12, 21 5:12, 21  
42:7

< M >

**maintain** 6:21 9:7  
**maintained** 8:6  
**making** 24:6  
**manner** 34:10, 20  
**March** 10:20 11:19  
**MARKED** 3:10 4:17  
34:20 37:11  
**Market** 38:14 39:1, 8  
**markets** 25:7  
**marks** 41:10  
**math** 12:24  
**matter** 4:21 19:3  
**meaning** 7:5, 14  
9:24 11:24 18:20  
**Melissa** 36:20



merged 6:8  
 met 18:21  
 Metals 38:13 39:15  
 MICHAEL 1:7  
 middle 21:4 27:23  
 million 6:17  
 Milwaukee 2:4, 8  
 misrepresentation  
 32:20, 22 33:5  
 Modification 10:14  
 18:18 24:9  
 money 24:17, 21 25:7  
 months 22:9  
 morning 5:18, 19  
 MORTGAGE 2:10  
 3:17, 18 5:10 6:5, 12,  
 15, 16, 18, 23 7:5, 10,  
 22 8:2, 7 9:3, 17, 18  
 11:9 12:1 13:8, 9  
 15:3, 21, 23 16:25  
 17:2 19:3 20:2, 13,  
 15, 21, 23 21:1 22:5  
 26:7 27:10, 11 29:10,  
 21 30:17, 22, 24  
 31:20, 22, 23, 24 32:1,  
 24 33:21, 24 34:8, 9,  
 18  
 Mortgage000239  
 20:22  
 mortgages 6:22  
  
 < N >  
 name 5:20, 22 6:6  
 21:5, 25  
 nature 6:15  
 necessary 30:24  
 need 19:24  
 needs 30:7  
 negligent 32:20  
 net 12:18 28:8 30:3  
 37:18  
 new 14:5  
 North 2:3  
 Notary 4:5 42:6, 13  
 43:20  
 note 9:25 10:3, 21  
 11:1, 18 12:1  
 November 16:17  
 number 6:18 8:3  
 9:17 10:19 14:22

16:15 17:1 22:1  
 27:11 30:14  
 Numbers 4:16 12:25  
 18:22 19:12, 14 24:5  
  
 < O >  
 oath 4:14 5:14 42:1  
 Objection 12:22  
 27:5 33:15 34:14  
 40:10  
 obligation 31:22 32:2  
 obligations 6:20 9:4,  
 6 18:21 19:9, 15  
 o'clock 4:9  
 October 14:18 38:12,  
 18  
 OCWEN 5:25 6:5, 7,  
 8  
 offer 16:11, 17, 20  
 18:19 19:12 24:10  
 31:21  
 Okay 9:21, 23, 24  
 10:10 13:4 15:20  
 16:6 17:9  
 Olas 2:11  
 O'NEIL 2:6  
 option 24:8  
 options 18:16 24:7, 9  
 ordering 15:8, 17  
 original 9:25 10:4, 21  
 originator 8:25  
 outside 22:25  
 outstanding 11:3  
 owe 15:12  
 owed 11:25 12:20  
 28:12 33:25  
 owned 13:21 25:14  
 27:14 34:12, 22  
 owner's 28:4  
  
 < P >  
 PAGE 3:3 10:9, 18  
 11:7, 14 12:3 13:20,  
 21, 24 14:13, 17, 22,  
 24 15:2, 11, 16 16:14  
 21:4, 9 22:3 23:15,  
 16, 22 26:2 27:20  
 28:14 30:7, 13 32:9  
 33:2 37:17 38:17

pages 7:11  
 paid 28:3 37:19  
 Palay 38:18  
 Palay's 38:20  
 Palm 1:19 4:7, 24  
 42:4 43:3  
 paperwork 29:3  
 paragraph 10:19  
 11:16, 22 15:11, 16  
 29:20 30:7 32:17  
 33:3 38:25  
 parties 43:12, 13  
 pay 11:19 12:8, 15  
 payable 10:20  
 payment 11:19 12:18  
 payments 9:7 11:20  
 payoff 29:23 30:11,  
 18 32:24 37:11  
 penalty 32:18 33:4  
 perjury 32:18 33:4  
 permanent 22:9  
 person 5:10 22:15  
 23:16  
 personal 38:22  
 personally 42:8  
 Peter 5:23  
 PHH 2:10 5:10 6:5,  
 7, 9, 12, 15, 23 7:5, 10,  
 22 8:2, 7 9:3, 18  
 13:8, 9 15:2, 21, 23  
 16:25 17:1 19:3  
 20:2, 13, 14, 21, 22, 23  
 27:10, 11 29:10, 21  
 30:17, 22, 24 31:20,  
 23 32:1 33:21, 24  
 34:8, 18  
 PHH0218 20:24  
 PHH0372 15:22  
 PHH0383 16:15  
 phone 22:1  
 photos 39:12  
 pile 7:1, 3  
 PLACE 1:19  
 Plaintiff 1:5 2:2 5:7  
 PLASSE 1:14 3:4  
 4:1, 12, 21 5:12, 21  
 42:7  
 please 5:2, 20 9:15  
 10:7 13:5 14:14, 23

15:20 16:24 20:17  
 27:8 36:18 38:10  
 portion 17:15 18:10  
 26:25 27:4 28:19  
 29:1 31:4, 11 33:8,  
 14 34:3, 7, 24 35:5, 7,  
 16, 18 36:2, 4, 16  
 37:22 38:9 39:17  
 40:9, 13, 24  
 portions 3:7  
 position 6:2  
 Precious 38:13 39:14  
 prepared 7:9  
 present 2:14 5:4, 6, 9  
 price 16:10, 21 27:24  
 prior 8:1  
 proceeds 12:7 31:18  
 process 19:2 20:2  
 31:16  
 produced 8:3 13:9  
 15:21, 23 16:25  
 20:21, 23 27:9  
 promissory 10:21  
 properly 30:20  
 property 8:17 10:1,  
 4 12:6, 7 15:18 16:6  
 18:19 19:14 21:10,  
 11, 14, 15, 17, 20, 24  
 27:24 28:12 29:17  
 30:4, 23 33:18 36:19,  
 24 37:9, 15 38:22  
 39:2  
 provide 19:19  
 provided 30:10  
 Public 4:5 42:6, 13  
 43:20  
 Purchase 3:15 16:2,  
 10, 11, 17, 20, 21  
 purchased 14:4, 5  
 purpose 4:3 24:1  
 Pursuant 18:24  
 19:24  
  
 < Q >  
 qualify 18:17  
 question 34:16  
 questions 7:19, 20, 22  
 8:9 9:8 40:25 41:2  
  
 < R >

**RANDALL** 1:4 4:22  
5:8 7:6 8:10, 11, 23,  
24 10:15, 25 11:10,  
17, 18, 25 12:10, 11  
13:16 15:7, 8 16:16  
17:5, 6 21:6 24:20  
25:2 26:19 27:15  
28:15 29:10, 11 32:7,  
14, 16 33:3, 25 34:1,  
8, 18 36:20 37:14, 19,  
20 38:23 39:5  
**Randalls** 12:19  
13:21 14:4 15:12  
16:3 28:7 30:3  
33:19  
**Randall's** 12:8 38:19  
**Read** 41:6, 9  
**Reading** 41:15  
**Real** 3:13 13:12  
25:14 28:4  
**realtor** 19:12, 13, 19  
**receipt** 30:18  
**receive** 19:7 28:8  
30:3 33:21  
**receiving** 22:19  
**record** 4:19 5:3  
41:12  
**recordkeeping** 6:21  
**records** 8:7  
**redacted** 3:7 17:15  
18:10 26:25 27:4  
28:19 29:1 31:4, 11  
33:8, 14 34:3, 7, 24  
35:5, 7, 16, 18 36:2, 4,  
16 37:22 38:9 39:17  
40:9, 13, 24  
**Redemption** 3:21  
**reduced** 32:24  
**reduction** 22:23  
**REED** 1:7  
**reference** 31:13  
**referenced** 15:1  
29:24 31:24  
**REINHART** 2:3  
**relates** 10:1 13:16  
29:17  
**relating** 9:12 29:3  
**relationship** 6:4  
**relative** 43:11, 12

**release** 30:22 32:1  
**rely** 20:15  
**remaining** 31:16, 24  
33:25  
**repayment** 32:23  
**Report** 3:23 38:11,  
13 39:12 43:6  
**reported** 1:21  
**Reporter** 4:4 5:1  
**represent** 20:13  
**representative** 6:11  
**represented** 32:17  
**request** 19:4 20:3  
38:20  
**requested** 19:23  
**requesting** 24:2  
**required** 31:25  
**residence** 13:25  
**Residential** 3:15  
8:12 16:1  
**response** 7:25 31:2  
**responsibilities** 9:4  
**resulted** 12:18  
**resulting** 32:22  
**review** 30:8  
**right** 23:20, 21 29:16  
  
< S >  
**S.C** 2:3, 6  
**Sale** 3:15, 20 12:7,  
18 16:2 18:12, 14, 15,  
24 19:4, 10, 17 21:24  
24:8 27:14, 24 28:8  
29:4, 23 30:4, 10  
31:17, 21 32:3, 11  
33:18, 22 36:19  
37:10, 19  
**SAMUEL** 2:4 5:6  
**SARA** 2:12 5:9  
**satisfaction** 30:19, 23  
31:22  
**satisfied** 19:15  
**savings** 24:24 25:3  
**says** 11:23 13:24  
21:6, 14, 17, 20 22:18,  
22 23:12 25:20 26:3,  
6, 9, 11, 16 29:21  
30:6, 17 31:15, 20  
38:25

**seal** 42:9  
**section** 22:12 30:14  
**see** 17:13 23:23  
30:15 31:13, 18 32:4,  
11 36:21, 24 37:2, 20  
38:14, 23 39:2, 9, 15  
**seen** 7:6  
**sell** 18:18 21:20  
**seller** 28:3  
**sellers** 16:3  
**senior** 6:3  
**sense** 18:22  
**sent** 29:9, 13 37:11  
**separate** 3:7  
**separation** 23:7  
**September** 38:21  
**served** 7:4  
**service** 6:17, 18, 20,  
22 9:7, 11  
**servicer** 6:16, 19  
18:20 32:21  
**services** 6:24 13:13  
29:21 30:22, 24  
31:20, 23 32:1  
**seven** 14:4  
**seven-year-old** 13:25  
**shares** 34:22, 23  
**Short** 3:20 12:15  
18:12, 14, 15, 23, 24  
19:4, 10, 16 24:8  
29:4, 23 30:10 31:17,  
21 32:3, 11 37:10  
**Siems** 36:20  
**S-i-e-m-s** 36:21  
**sign** 26:19  
**signatory** 32:19  
**signature** 17:7, 8  
26:21  
**signed** 10:14 14:18  
16:17 17:5, 6 28:15  
30:21 32:6, 13 34:11,  
21  
**significant** 24:12  
**signing** 26:16 41:15  
**silver** 39:14  
**single** 13:25  
**situation** 24:5  
**six** 22:9  
**SOLANO** 2:12 5:9

27:5 41:6, 9  
**sold** 15:18 37:14  
**somebody** 19:13  
**sorry** 37:3  
**South** 4:6, 23  
**space** 14:8  
**specifically** 8:16  
**Speculation** 40:11  
**spell** 5:22  
**square** 14:7  
**STACY** 1:4 4:22  
5:7 8:10, 23 10:14,  
25 11:10, 17, 25  
12:10 13:16 15:7  
16:16 21:6, 10 22:8,  
18 24:20 25:2, 10, 17,  
25 26:19 27:14  
28:15 29:10 32:6, 13  
33:3, 25 34:8, 18  
36:20 37:14, 19  
38:19, 22 39:5  
**stamp** 9:17 15:22  
16:15 17:1 27:11  
30:14 37:4  
**starts** 10:8  
**State** 4:5, 7 5:20  
31:25 42:3, 6, 13  
43:2, 20  
**stated** 9:6  
**Statement** 3:19 20:9,  
12 27:13 36:19  
37:13  
**STATES** 1:2  
**Stenographically**  
1:21 43:6  
**Steven** 8:11, 24  
10:15, 25 11:10, 18,  
25 12:11 15:8 16:16  
17:5 27:15 28:15  
29:10 33:25 36:20  
37:20  
**Stock** 3:21 34:12, 23  
**stocks** 25:7  
**Stoughton** 29:11  
36:25  
**Street** 2:3  
**subject** 33:5  
**submitting** 26:12  
**Subpoena** 3:11 7:3,

11, 25  
**subpoenas** 8:1  
**subsequent** 11:20  
**subservicer** 6:8  
**suburb** 8:20  
**successful** 32:3  
**suggest** 10:24  
**Suite** 1:19 2:3, 8, 11  
 4:6, 24  
**sum** 15:13 30:11  
 34:1  
**summary** 39:7  
**Sure** 13:6 16:3 17:5,  
 7 19:20  
**sworn** 4:14 5:14  
 42:8  
**SYLVAN** 2:4 5:6  
 12:22 14:21, 25 15:4  
 33:15 34:14 37:3  
 40:10 41:2  
  
**< T >**  
**take** 19:7 24:13  
**TAKEN** 1:15 4:2, 21  
 8:10, 23 19:6 24:6  
 31:1  
**talk** 28:18  
**talks** 22:12 23:22  
**Tampa** 8:20  
**taxes** 28:4  
**tell** 15:24 17:2  
 24:23 34:8, 18  
**telling** 20:13  
**term** 22:9  
**testified** 4:14 5:14  
**testify** 6:11 7:3, 9, 15,  
 17  
**testifying** 7:14  
**testimony** 43:8  
**Thank** 15:4 41:1, 2,  
 3, 5  
**things** 15:8  
**think** 9:22  
**three** 14:11  
**TIME** 1:18 4:20  
 12:20 15:12 18:15,  
 18 20:18 25:4 37:14  
 41:4, 11  
**timely** 30:18  
**titled** 21:1

**today** 6:10 7:13, 17,  
 20 8:9  
**Today's** 4:19 41:11  
**top** 7:2 13:15, 20  
 17:12 22:4 23:15  
 27:19 33:3  
**topics** 7:11  
**total** 24:24  
**totals** 39:8  
**transcript** 43:7  
**transcription** 43:8  
**true** 43:7  
**truthful** 26:8, 17  
**trying** 13:2  
**T's** 19:21  
**turn** 9:21 10:7  
 14:13 26:2 38:10  
**two** 13:1  
**types** 39:14  
  
**< U >**  
**U.S** 6:24 9:1 11:9,  
 25 12:4, 8, 9, 20 15:7,  
 12 16:22 28:12  
 29:22 34:1  
**ultimately** 8:25  
**umbrella** 6:8  
**understand** 6:10  
 7:13, 23  
**understanding** 24:4  
**understands** 33:4  
**understood** 30:7  
**unemployed** 22:19  
**Uniform** 3:14 14:14  
**Unit** 29:14 36:25  
**UNITED** 1:2  
**use** 4:3  
  
**< V >**  
**vacant** 21:18  
**Valuation** 3:13 13:13  
**value** 25:8, 14 38:14  
 39:1, 8  
**VAN** 2:3  
**various** 22:15 28:2  
**Verified** 3:12 9:16  
 11:8  
**versus** 4:22  
**video** 4:18, 20  
**videoconference** 2:5

**Videographer** 2:14  
 4:18, 25 41:10  
**violate** 26:12  
  
**< W >**  
**waiting** 19:18  
**waive** 18:25 24:2, 12  
 31:23 33:24 41:6  
**waived** 41:16  
**waiver** 29:4 31:13,  
 25  
**want** 12:24 20:18  
 21:20  
**Water** 2:3  
**WATERS** 1:8 34:12  
**way** 16:13  
**Wednesday** 1:18 4:8  
**well** 8:1 24:14 29:9  
**went** 11:3 16:20  
**We're** 4:18 41:3, 11  
**West** 1:19 4:7, 24  
**WESTERN** 1:2  
**we've** 34:19  
**wherefore** 12:4  
**WIDEN** 1:7 4:22  
 7:6  
**WINDY** 1:8 34:12  
 37:6  
**WISCONSIN** 1:2  
 2:4, 8 29:11 36:25  
**withdrawal** 30:25  
**WITNESS** 1:14 3:3  
 4:1, 13 5:13 41:5, 7  
 42:9 43:9  
**words** 7:19  
  
**< Y >**  
**Yeah** 14:25 15:2  
 16:3  
**years** 14:4  
  
**< Z >**  
**Zero** 26:1  
**Zoom** 5:7